

Exhibit D



July 1, 2004

Robert J. McCully

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Brian Williams
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3550 IDS Center
80 S. 8th Street
Minneapolis, MN 55402-2100

Re: In re Pharmaceutical Industry Average Wholesale Price Litigation, MDL No. 1456

Dear Brian:

On behalf of our client, Aventis Pharmaceuticals Inc. ("Aventis"), enclosed please find three CDs containing information responsive to Plaintiffs' Omnibus Requests for Production and Interrogatories. We are producing this information, which is responsive specifically to Requests for Production Nos. 25 - 28 and Interrogatory No. 1, in accordance with our letter of June 1, 2004.

The enclosed CDs are numbered AV-CD-002, AV-CD-003, and AV-CD-004. Aventis considers all of the information contained herein to be "highly confidential" under the terms of the Protective Order of Confidentiality, and we have marked the CD labels "Highly Confidential." The CDs, and the data contained therein, should be handled accordingly.

AV-CD-002 and AV-CD-003 are entitled "Chargeback, Rebate, and Fees; AVENTIS APPENDIX A PRODUCTS, 4Q1997 - 4Q2001" and contain .csv and .xls files that are named according to product name, time period, and type of information contained therein (i.e. chargebacks or rebates/fees). The one .xls file is named "RPR Prods 4Q 1997 and all Qs 1998," and contains rebate information for those Appendix A products manufactured by RPR for the quarters specified. There are approximately 4.1 million lines of data contained within the files on these two CDs.

AV-CD-003 is entitled "Sales Invoice Data, AVENTIS APPENDIX A PRODUCTS, 4Q1997 - 4Q2001" and contains .xls files that are named according to the time period and legacy company associated with the Appendix A product. In addition, there are two other .xls files on this CD that provide reference tables to codes used within the sales invoice data. The file named "Invoice Type & Cust. Group Cross Ref HMR 1998 to 2001 RPR 070100 to 123101.xls" contains descriptions for the invoice type and customer group codes that you will see within the sales invoice files for each of the HMR data files

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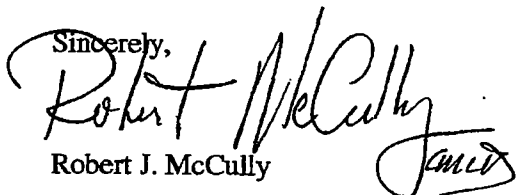
Brian Williams
July 1, 2004
Page 2

and for the RPR data file after July 1, 2000. The file named "Master Customer Name Name.xls" contains additional customer information corresponding to the Invoice Recip. Cust. No. field within the "HMR Invoices 010198 to 123198.xls" file. There are approximately 990,000 lines of data contained within the files on this CD.

As you know, Aventis was formed by the merger of two very different companies, each of which had its own method of record keeping and computerization. In order to compile this data, it was necessary to review multiple databases originating from multiple, different operating systems. Some of these systems are no longer supported and no one with personal knowledge as to their operation remains at Aventis. Considerable efforts have been made to identify, locate, and acquire the responsive data, and to provide consistency. However, differences do exist in some of the data formats over the time periods provided.

In our June 1 letter, we suggested that you use the pricing and transactional data now provided to determine which Aventis products might realistically be considered key to plaintiffs' analysis and which, by contrast, could be at least preliminarily excluded from discovery. We hope, in the continued spirit of reasonableness, that plaintiffs will undertake such an analysis. In the meantime, we will continue to review files with the intent of making our next rolling production of documents to you on or before July 20, 2004. In the meantime, if you have any questions concerning this production, please feel free to contact me.

Sincerely,



Robert J. McCully

RJM:mkw

cc: Susan E. MacMenamin (via fax) (w/o encl.)
David Woodward (via fax) (w/o encl.)

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